

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHARLES TILL,)	
)	
Plaintiff,)	No.: 21-CV-1256
)	
NATIONAL GENERAL ACCIDENT AND)	Judge Thomas Durkin
HEALTH INSURANCE COMPANY,)	
)	
Defendant,)	

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE HIS SUPPLEMENTAL BRIEF
PURSUANT TO THIS COURT'S 12/3/21 ORDER**

NOW COMES Plaintiff, CHARLES TILL, by and through his attorneys, The Kreamer Law Group, and for his Unopposed Motion for an Extension of Time to file his Supplemental Brief Pursuant to this Court's 12/3/21 Order, states as follows:

1. This Honorable Court entered an order on 12/3/21 requesting the parties to file additional briefs with respect to Defendant's pending Motion to Dismiss by 1/14/22.²
2. Plaintiff's attorneys have been diligently working on trying to complete the same, however they need additional time to do so.
3. Plaintiff's attorneys both had pre-scheduled time off around the holidays which limited their time to finalize the supplemental brief.
4. Additionally, Plaintiff's attorneys are engaged in conducting and preparing for two different trials in the month of January pending in Arbitration (White v. State Farm, 01-21-001-1113) and Cook County (Yordy v. Kishta, 19 M1 11400).
5. Plaintiff's attorney John Kreamer also contracted Covid-19 and was forced to be off work for several days requiring Plaintiff's attorney Joe Urani to fill in for some of his other matters.

6. In light of the above, Plaintiff's attorneys require a short extension of time to complete and file the supplemental brief in this matter.
7. This motion and relief being sought is not being done to cause any undue delay in this matter, and will not cause any prejudice to either party.
8. In order that substantial justice in this matter is achieved, Plaintiff's respectfully ask for an additional 14 days from 1/14/22, or until 1/28/22 to file their supplement brief pursuant to this Court's order.
9. No previous extension in this regard was requested by Plaintiff.
10. Counsel for Plaintiff Joe Urani reached out to Counsel for Defendant Dennis Berg prior to filing this motion and Mr. Berg indicated that he did not have an objection to the relief being sought herein.

WHEREFORE, Plaintiff prays that this honorable Court grant this motion and enter an order granting him an additional 14 days to complete and file his supplemental brief in this matter, and for any further relief the Court deems appropriate and just.

Respectfully submitted,

CHARLES TILL

By: /s/ Joseph E. Urani
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 13, 2022, he electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following registered CM/ECF participant(s):

To: Dennis Berg, Esq.
PIPAL & BERG, LLP
100 S. Wacker Drive
Suite 900
Chicago, Illinois 60606

/s/ Joseph E. Urani